

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEPTEMBER 11, 1991

Ms. Theresa A. Pfeifer
Metro Wastewater Reclamation District
6450 York Street
Denver, CO 80229-7499

Dear Ms. Pfeifer,

I am writing in response to your letter of June 21, 1991 requesting clarification on the use of ASTM method D-56. I have reviewed the criteria of ASTM method D-93 and noted the limitations to which you referred. The method does specify that "liquids having viscosities less than 5.5 centistrokes at 40°C (104°F) [and] do not contain suspended solids or do not have a tendency to form a surface film while under test conditions should be tested in accordance with Test Method D-56". The regulations in 40 CFR §261.21 specify the use of D-93-79 or D-93-80. However, because D-56 was referenced by D-93 and was available in the same 1979 and 1980 editions of the Annual Book of ASTM Standards, you may use D-56 without submitting an equivalency petition.

Please keep in mind that this is EPA's interpretation of its own regulations, not that of your particular state. States can be authorized to implement a hazardous waste program in lieu of EPA's implementation and your states' variations on the above described testing regime may need to be checked. I suggest you contact them as soon as possible for additional clarification.

If you have any further questions, please feel free to call me at (202) 260-4761.

Sincerely yours,

Gail Hansen
Chief,
Methods Section
(OS-331)

cc: Alec McBride
Dave Topping
David Bussard
Mark Badalamente, OGC
Rue Potter

RCRA/Superfund Hotline
MICE Line